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Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
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LEHMAN BROTHERS HOLDINGS INC., LEHMAN	:	
BROTHERS SPECIAL FINANCING INC., LEHMAN	:	
BROTHERS COMMODITY SERVICES INC., LEHMAN	:	
BROTHERS COMMERCIAL CORPORATION, and	:	
OFFICIAL COMMITTEE OF UNSECURED	:	
CREDITORS OF LEHMAN BROTHERS HOLDINGS	:	Adversary Proceeding
INC., <i>et al.</i> ,	:	No. 12-01874 (SCC)
Plaintiffs,	:	
	:	
v.	:	
	:	
JPMORGAN CHASE BANK, N.A., J.P. MORGAN MARKETS	:	
LIMITED (F/K/A BEAR STEARNS INTERNATIONAL	:	
LIMITED), J.P. MORGAN SECURITIES LTD., J.P. MORGAN	:	
VENTURES ENERGY CORPORATION, JP MORGAN CHASE	:	
AND CO., JPMORGAN BANK DUBLIN (F/K/A BEAR	:	
STEARNS BANK PLC), BEAR STEARNS CREDIT	:	
PRODUCTS INC. and BEAR STEARNS FOREX INC.,	:	
	:	
Defendants.	:	
-----	X	

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING MOTION  
OF LEHMAN BROTHERS HOLDINGS INC. AND OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, PURSUANT TO FED. R. BANKR. P. 9019 AND  
11 U.S.C. § 105(a), FOR ENTRY OF ORDER APPROVING SETTLEMENT  
AGREEMENT WITH JPMORGAN CHASE BANK, N.A. AND CERTAIN OF ITS  
AFFILIATES WITH RESPECT TO AVOIDANCE ACTION AND DERIVATIVES  
CLAIMS OBJECTIONS AND GRANTING RELATED RELIEF**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with both the Order Modifying Certain Existing Claims Orders [ECF No. 29505] and the Second Amended Order Pursuant To Section 105(a) Of Bankruptcy Code And Bankruptcy Rules 1015(c) And 9007 Implementing Certain Notice And Case Management Procedures [ECF No. 9635] (the “Case Management Order”), the undersigned hereby certifies as follows.

1. On January 25, 2016, Lehman Brothers Holdings Inc., as Plan Administrator (the “Plan Administrator”), and the Official Committee of Unsecured Creditors, through its Litigation Subcommittee (the “Committee”), filed with the Court for hearing on February 8, 2016 the Motion, Pursuant To Fed. R. Bankr. P. 9019 And 11 U.S.C. § 105(a), For Entry Of Order Approving Settlement Agreement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates With Respect To Avoidance Action And Derivatives Claims Objections And Granting Related Relief [ECF No. 51904] (the “Settlement Motion”). Capitalized terms not defined herein have the meanings ascribed to them in the Settlement Motion.

2. The Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Settlement Motion of February 2, 2016 at 4:00 p.m. (Prevailing Eastern Time). The Plan Administrator noticed a hearing with respect to the Settlement Motion for ten (10) business days after the filing date of January 25, 2016, that is, February 8, 2016 at 10:00 a.m. (Prevailing Eastern Time).

3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket in the above-referenced cases in accordance with the procedures set forth in the Case Management Order, or (b) served on counsel to the Plan Administrator or the Committee with respect to the Settlement Motion.

4. Ricky Myron Gregory filed two letters with respect to the Settlement Motion with the United States District Court for the Southern District of New York (the “District Court”)<sup>1</sup>

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<sup>1</sup> On August 4, 2014, the District Court, in Case No. 11-cv-6760 (RJS), withdrew the reference with respect to the Avoidance Action [District Court ECF No. 45].

[District Court ECF No. 112, 113], neither of which opposes the Settlement Motion—and one of which supports the relief requested in the Settlement Motion. The letters are attached hereto as **Exhibits 1 & 2**. On January 30, 2016, William Kuntz sent an email to the Court (and others) which references the Settlement Agreement and suggests the matter should be stayed so an examiner can be appointed to investigate the loss of stockholder equity. A copy of Mr. Kuntz's correspondence is attached hereto as **Exhibit 3**. Other than Mr. Gregory's and Mr. Kuntz's correspondence, to the best of my knowledge, no response or correspondence has been filed with, or submitted to this or any other court with respect to the Settlement Motion.

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WHEREFORE, the Plan Administrator and the Committee respectfully request that the Court enter the proposed Order granting the Settlement Motion annexed hereto as **Exhibit 4** during or following the hearing on February 8, 2016.

Dated: February 4, 2016  
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST, COLT &  
MOSLE LLP

By: /s/ Joseph D. Pizzuro

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